



United States Department of the Interior

FISH AND WILDLIFE SERVICE

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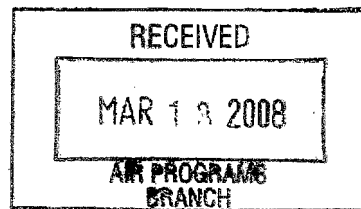


IN REPLY REFER
TO:

FWS/RIFO

March 12, 2008

Ms. Pamela Blakley
Chief Air Permits Section
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604-3590



Dear Ms. Blakley:

This responds to your March 6th, 2008 letter with biological evaluation for the Prevention of Significant Deterioration (PSD) permit related to the proposed expansion project at the Gateway Energy and Coke Company in Granite City, Illinois. You requested our concurrence on your affects determination in the letter pursuant to Section 7 of Endangered Species Act. We have reviewed the information provided in your letter, biological evaluation, technical materials, and have coordinated with your staff. We concur with your findings that approval of this PSD permit will not likely adversely affect the federally listed species in the action area as defined in the biological evaluation.

Your biological evaluation and the technical materials included a variety of analyses that we used to support our concurrence. The analyses included the results of air modeling and contaminant deposition over a period of 30 years. We have not reviewed the air model methods or results and depend on your agency and the state agency for this technical review and approval. The analyses included a comparison of the predicted maximum concentrations of criteria pollutants and the hazardous air pollutants of concern in the action area media to ecological toxicity reference values published in the scientific literature. In addition, a food chain exposure analysis was done using the available mercury results because some contaminants can biomagnify in higher trophic level organisms.

Based on these analyses, we conclude that local flora and fauna, including federally listed species, will be exposed to contaminants from the proposed future emissions from this facility. However, this exposure we believe, based on the best available information, will not elicit a detectable negative response from the listed species. In addition, the increment of change anticipated over the next 30 years when added to the existing baseline condition is not likely to

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An analysis of the ecological effects from this facility's gaseous emissions into the atmosphere is beyond the scope of this Section 7 review and thus, was not evaluated. An analysis of the cumulative effects from emissions at this facility combined with emissions at other facilities outside of the action area is beyond the scope of this Section 7 review and thus, was not evaluated.

Thank you for the opportunity to coordinate with you on this matter. Please feel free to call me at extension 201 or Mike Coffey of my staff at extension 206 if you have any questions or wish to discuss this further.

Richard Wilson

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